

**UBCP RETIREMENT BENEFITS SOCIETY**

**(the "Society")**

**PROCEDURE FOR PRIVACY COMPLAINTS**

**(adopted December 13, 2005)**

**(Reviewed December 11, 2007)**

This document outlines the procedure to be used by the Society for dealing with privacy complaints.

The Society will refer all complainants with complaints or disputes about the collection, use, disclosure and protection of their personal information or other privacy issues to the Privacy Officer (contact information below).

A complainant may contact the Privacy Officer directly by telephone, e-mail or letter at:

Privacy Officer: Sarah King  
Address: 320 – 1155 West Pender St. Vancouver, BC  
V6E 2P4  
Phone: 604-689-0727 ext. 2261  
Facsimile: 604-685-1478  
E-mail: sarah.king@ubcp.com

The Privacy Officer will inform the complainant that all complaints must be in writing. Written complaints should specify the nature and substance of the complaint, the relevant date and the names of any Plan members, employees or volunteers involved. The complainant should also attach copies of any relevant documents.

The Privacy Officer will verify the complainant's identity and inform the complainant that the Privacy Officer may access that complainant's information and discuss the complaint with either Society directors, staff or volunteers, as appropriate, to investigate and resolve the complaint.

The Privacy Officer will acknowledge receipt of all written complaints (including date of receipt) and will respond promptly in writing to all complaints. If investigation and analysis is required, the Privacy Officer will advise the complainant of the status of matters on a periodic basis. The Privacy Officer will seek to resolve all complaints in a timely fashion and to the mutual satisfaction of the complainant and the Society.

The Privacy Officer will inform the complainant in writing about the outcome of the investigation and the resolution or non-resolution of the complaint. If the Privacy Officer determines, either before or after an investigation, that the complaint is not well-founded, the Privacy Officer will inform the complainant in writing of this decision and, in brief, the reasons for it.

Following the resolution of a complaint, the Privacy Officer will initiate any necessary remedial action. This may include recommending changes in the Society's procedures and/or staff training to prevent a similar future complaint.

The Privacy Officer will keep records of all privacy complaints, including the details of any investigation and the resolution reached. The Privacy Officer will prepare reports for management about the quantity, nature and resolution or non-resolution of complaints, and any actions taken to prevent further valid complaints.

If a complaint is not resolved to the complainant's satisfaction, the Privacy Officer will inform the complainant that the complaint may address the issue with the British Columbia Privacy Commissioner, whose contact information is as follows:

Office of the Information and Privacy Commissioner for British Columbia  
Attention: Privacy Commissioner  
P.O. Box 9038, Stn. Prov. Govt.  
Victoria, BC V8W 9A4

Phone: 250.387.5629  
Toll-free: 604.660.2421 (request transfer to 250.387.5629)  
Facsimile: 250.387.1696  
Web: [www.oipc.bc.ca](http://www.oipc.bc.ca)